

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

KANE MARCEAUX, ET AL.

CIVIL ACTION NO: 6:12-cv-01532

VERSUS

JUDGE RICHARD T. HAIK, SR.

LAFAYETTE CITY-PARISH CONSOLIDATED
GOVERNMENT, ET AL

MAGISTRATE JUDGE PATRICK J. HANNA

AFFIDAVIT OF DEE EDWARD STANLEY
POIENCOT, CORMIER, THOMPSON MOTION FOR SUMMARY JUDGMENT

STATE OF LOUISIANA
PARISH OF LAFAYETTE

BEFORE ME, Notary Public, personally came and appeared:

DEE EDWARD STANLEY

who, after being first duly sworn, did depose and say, based on his own personal knowledge, that:

1.

I am a Defendant in the above-captioned matter and am competent to testify as to the allegations asserted by Plaintiffs.

2.

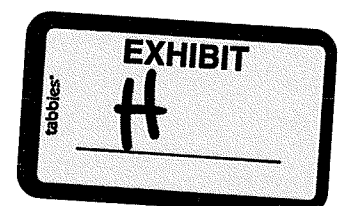
I am the Chief Administrative Officer for Lafayette City-Parish Consolidated Government ("LCG") and served in that capacity at all times relevant to these proceedings.

3.

The provisions of the LCG Policies and Procedures Manual ("PPM") attached to the Motion for Summary Judgment filed on my behalf as Appendix VIII (PPM 2161) is a true and correct copy of said PPM.

4.

I did **not** receive notice of Plaintiffs' Petition for Temporary Restraining Order and Injunction filed in the Fifteenth Judicial District, Lafayette, Louisiana (Docket No. 2012-2889) on May 22, 2012.



5.

On May 29, 2012, I learned that Plaintiff, Scott Poiencot, had been secretly recording his fellow and superior officers since 2006. Shortly thereafter, I learned that several other Plaintiffs routinely surreptitiously recorded and/or video-taped their interactions with fellow and superior officers.

6.

On or about May 8, 2012, I learned that someone with access to a confidential shift-level investigative file leaked a confidential document to attorney, Olita Magee. Ms. Magee attached a copy of the confidential document to a brief filed with the Lafayette Municipal Fire & Police Civil Service Board.

7.

On or about May 11, 2012, I, as Chief Craft's designee in his absence (per G.O. 301.9), ordered an investigation into the source of the leaked document.

8.

Lafayette City-Parish Consolidated Government maintains a strict confidentiality policy, set forth in Policy and Procedures Manual ("PPM") 2161-2.

9.

LCG and LPD rely on members of the public to provide critical information, to serve as witnesses, to respect law enforcement authority, and to provide financial support. The public's support and confidence is critical to the proper functioning of LCG and LPD.


DEE EDWARD STANLEY

SWORN TO AND SUBSCRIBED before me this 2nd day of May, 2014.


NOTARY PUBLIC

PRINT NAME:

Michael P. Corry

Notary #:

20764

